

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 20-21203-GLT
CHRISTOPHER D. MAMULA,	:	Chapter 13
THERESA HEINMILLER,	:	
	:	
Debtors.	:	
	:	
	:	Document No.
CHRISTOPHER D. MAMULA,	:	
THERESA HEINMILLER,	:	
	:	
Movants,	:	
	:	
	:	
v.	:	
	:	
	:	
	:	
NORCOM MORTGAGE,	:	
	:	
Respondent.	:	

**MOTION TO APPROVE POST-PETITION MORTGAGE FINANCING**  
**FOR THE PURCHASE OF REAL ESTATE**

AND NOW come Debtors, by and through their counsel, Amy L. Zema, Esquire., hereby requesting an order approving post-petition mortgage financing to for the purchase of real estate, representing as follows:

1. Debtors' Chapter 13 case was filed on April 6, 2020.
2. At the time of filing, Debtors were parties to a residential lease in the amount of \$1,200 per month. At the term of the lease the monthly rent was raised substantially to an amount Debtors believed was unreasonable. Debtors were unable to find alternative rental property suitable to accommodate their family in an amount less than \$2,000 per month.
3. Debtors temporarily moved to their respective parents' homes and have been actively seeking a home to purchase.
4. Debtors have since found a home for purchase located at 3920 South Mountain Road, Knoxville, Maryland 21758 in the amount of \$330,000.00.
5. Joint Debtor has been approved for a mortgage on the premises pending approval from the bankruptcy court. A copy of the final loan estimate is attached.
6. The source of funds for the closing costs is from a bonus Joint Debtor received January 2021.
7. The source of funds for monthly mortgage payments will be Joint Debtor's wages. In addition, relocating to the new home will eliminate Debtors' \$1200/month daycare expense, making these funds available for the housing expense.

8. Following are the terms of the mortgage financing:
  - a. The financing with Norcom Mortgage will be the only mortgage on the property
  - b. Loan amount: \$324,022.00
  - c. Interest rate: 3.625%
  - d. Term of loan: 30 years
  - e. Total monthly mortgage payment \$2,039.00, calculated as follows:
    - 1) Principal and interest: \$1,477.71
    - 2) Escrow: \$337.00
    - 3) Mortgage insurance: \$224.00
9. The mortgage financing will be incorporated in the existing Chapter 13 Plan.
10. The monthly Chapter 13 Plan payment in the amount of \$880 per month is remitted equally by Debtor and Joint Debtor employers. Joint Debtor's payments have been remitted in full and in a timely manner. Debtor's employer has remitted payments in full and in a timely manner, with the exception of the second payment scheduled to be made in October. To make certain that the Chapter 13 plan remained current, Debtor immediately accessed the TFS website, and remitted a payment of \$440 to be paid to the Chapter 13 Trustee. A copy of the TFS printout is attached.
11. The loan was expected to close November 15, 2021; however, all parties are aware that court approval must first be obtained.

**WHEREFORE**, Debtors respectfully request that this Honorable Court enter an order approving the proposed post-petition financing, to be paid through their Chapter 13 Plan.

Respectfully submitted,

Date: 11/4/2021

/s/Amy L. Zema  
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